

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2017-292-WS**

In the Matter of	)	
	)	
Application of Carolina Water Service,	)	
Inc. for an Adjustment of Rates and	)	<b>REHEARING REBUTTAL TESTIMONY</b>
Charges and Modifications to Certain	)	<b>OF</b>
Terms and Conditions for the Provision of	)	<b>KEVIN LAIRD</b>
Water and Sewer Service	)	

1    **Q.    PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2    **A.    My name is Kevin Laird and I work at Goodwyn Mills and Cawood, Inc. (GMC), at 101**  
3    **E. Washington Street, Suite 200, Greenville, SC 29601.**

4    **Q.    ARE YOU THE SAME KEVIN LAIRD WHO CAUSED PREFILED REHEARING**  
5    **DIRECT TESTIMONY TO BE FILED IN THIS PROCEEDING?**

6    **A.    Yes, I am.**

7    **Q.    WHAT IS THE PURPOSE OF YOUR REHEARING REBUTTAL TESTIMONY?**

8    **A.    The purpose of my testimony is to respond to certain statements contained in the testimony**  
9    **of Forty Love Point Homeowners Association Witness Jay Dixon concerning sewer service to his**  
10    **subdivision.**

11    **Q.    PLEASE DESCRIBE THE INTERACTION GMC HAS HAD WITH THE MR.**  
12    **DIXON AND OTHER RESIDENTS OF FORTY LOVE POINT SUBDIVISION?**

13    **A.    The GMC project manager for the Forty Love Point sewer project, Mr. Lesley Joseph, has**  
14    **met on numerous occasions with the homeowners known to be affected by the sewer backups**  
15    **during periods of heavy rain. He has met with each of them at their homes and discussed the short**  
16    **term remedial measures proposed for their properties. Additionally, Mr. Joseph has attended Forty**

1 Love Point Homeowners Association meetings to provide updates on the status of GMC's  
2 evaluation of the subdivision's LETTS sewer system and to answer questions of residents in  
3 attendance. The dates for the HOA meetings that Mr. Joseph attended were May 17, June 14, and  
4 July 26, 2018.

5 **Q. DID CAROLINA WATER SERVICE (CWS) ASK GMC TO WORK DIRECTLY**  
6 **WITH FORTY LOVE POINT PROPERTY OWNERS AND PROVIDE REGULAR**  
7 **UPDATES TO RESIDENTS REGARDING THE PROJECT STATUS?**

8 **A.** Yes, when CWS hired us, they made it clear that resolving the sewer issues for the  
9 homeowners experiencing sewer backups and addressing the long-term needs of the subdivision's  
10 LETTS sewer system was a top priority for the Company. As a result, we committed to providing  
11 regular communications with the Kings, Dixons and Waggoners and any other affected property  
12 owners regarding the work at their homes to reassure them of the progress being made to resolve  
13 their sewer service issues.

14 **Q. PLEASE DESCRIBE SOME OF THE UNIQUE FACTORS AFFECTING THE**  
15 **SEWER SERVICE QUALITY TO THE KINGS, DIXONS AND WAGGONERS'**  
16 **RESIDENCES.**

17 **A.** For the homes experiencing sewer backups at Forty Love Point, we have identified the  
18 following characteristics that appear to distinguish them from homes that are not experiencing  
19 any problems:

- 20 • **Finished basements.** Each home has a finished basement with sewer service. With these  
21 finished basements, the outgoing sewer service from the home must be installed at a  
22 lower elevation, which reduces the slope that is available at the connection to the septic  
23 tank and the main line.

- **Proximity to the main sewer line.** These homes appear to be the closest to the main line as it runs along the shoreline of the lake. As a result, the service lines that are connected to the main line are shorter, which results in less storage volume and slope in the event of a sewer backup.

In response to Mr. Dixon's statement that others are experiencing similar issues and are unwilling to come forward, GMC has told property owners of CWS's intention to resolve these issues and has repeatedly requested all homeowners with sewer issues to speak up, either publicly or confidentially with our project manager, Mr. Joseph, to ensure that their concerns are addressed.

**Q. MR. DIXON HAS TESTIFIED THAT THE ENTIRE FORTY LOVE POINT SUBDIVISION SEWER SYSTEM NEEDS TO BE OVERHAULED. WHAT IS YOUR PROFESSIONAL OPINION OF MR. DIXON'S CONCLUSION?**

**A.** Although I understand Mr. Dixon's frustration with the LETTS sewer system design in his subdivision, I do not agree that the entire system has to be overhauled. If the Company had a blank slate, it is unlikely CWS would seek to design and permit a LETTS sewer system for the Forty Love Point Subdivision. However, this is not a new subdivision and we do not have the luxury of installing a completely different system design now without extraordinary cost and disruption to the homeowners in Forty Love Point. In my professional opinion, the prudent and more cost-effective path to take is to make a number of system upgrades to the subdivision's sewer system over time.

**Q. PLEASE DESCRIBE THE SHORT TERM REMEDIAL MEASURES GMC IS TAKING AT THE AFFECTED RESIDENCES.**

**A.** As a short-term solution, GMC has recommended the installation of small, submersible pumps in the septic tanks of the three individual homes, along with a small diameter (< 4") effluent

force main to be connected to the nearest sewer line along the road. The objective of this solution is to provide relief to these homes by sending their effluent to a sewer line at a higher elevation prior to entering the main perimeter sewer line. The installation of these pumps is currently underway. During the design of this short-term solution, check valves will be installed at each of the three homes to prevent sewage backups. The project schedule for the implementation of the short-term solution is as follows:

Task	Start Date	Estimated Time of Completion
Surveying of individual homes	June 25, 2018	July 6, 2018
Design of pump/force main system at individual homes	July 9, 2018	July 27, 2018
Permitting for pump/force main system	July 30, 2018	August 31, 2018
Installation of pump and force main at individual homes	August 31, 2018	September 14, 2018

**Q. WHAT LONG TERM UPGRADES TO THE FORTY LOVE POINT SEWER SYSTEM HAS GMC RECOMMENDED?**

A. As a long-term solution, GMC has recommended the installation of a small, grinder pump station and effluent force main at the south end of the sewer system that will connect to the Hiller Road Pump Station. Currently, during peak flow conditions (*i.e.*, during rain events), CWS utilizes pump trucks to remove excess wastewater from the existing system and hauls it to a neighboring pump station. The implementation of the proposed pump station as a long-term solution would effectively handle peak flow conditions, improve the overall performance of the sewer system, and replace the use of the pump trucks to handle peak flow. This solution would remove wastewater from the system during rain events and send it to the Hiller Road Pump Station directly, thus significantly reducing the possibility of sewer backups occurring at the homes in the most cost-effective manner. An estimated schedule for this long-term solution can be found below:

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<b>Task</b>	<b>Anticipated Start Date</b>	<b>Estimated Time of Completion</b>
Surveying of Forty Love Point sewer system	August 24, 2018	August 31, 2018
Design of pump station and force main system	August 31, 2018	September 14, 2018
Permitting for pump station and force main design	September 14, 2018	October 12, 2018
Installation of pump station and force main	October 15, 2018	January 7, 2019

2 CWS is committed to performing the improvements that have been recommended by GMC in a  
3 timely manner.

4 **Q. HAS GMC PROVIDED ANY RECOMMENDATIONS TO CWS REGARDING**  
5 **CONTINUED OPERATIONS AND MAINTENANCE OF THE SYSTEM?**

6 **A.** Yes, we have recommended several tasks that would ensure that the system is operating as  
7 designed. These tasks include the following:

- 8 • Performing routine cleaning and maintenance of the residential septic tanks;
- 9 • Cleaning and inspecting the main sewer line along the lake;
- 10 • Locating and repairing all cleanouts throughout the sewer system; and
- 11 • Identifying and eliminating all direct sewer service connections from the homes to the main  
12 sewer line, which would contribute to solids buildup in the sewer system.

13 Performing these tasks on a regular basis will improve the efficiency of the sewer system and  
14 will enable the CWS operators to identify problems as they arise. CWS will need to continue to  
15 monitor and assess the system as the corrective actions are completed to ensure the system is  
16 meeting the sanitary flow requirements of the community.

17

1    **Q.    HAS GMC EXPERIENCED COOPERATIVE WORKING RELATIONSHIPS**  
2    **WITH THE HOMEOWNERS IN FORTY LOVE POINT SUBDIVISION?**

3    **A.**     Yes, the homeowners, including the Dixons, have been extremely cooperative and helpful  
4    in providing access to their properties by our engineers and surveyors. CWS and GMC are very  
5    appreciative of the efforts of the homeowners to assist us.

6    **Q.    DOES THIS CONCLUDE YOUR REHEARING REBUTTAL TESTIMONY?**

7    **A.**     Yes